

SCREENING OBSERVATIONS for US ARMY GARRISON FORT BUCHANAN

On April 25 and 26, 2017, Mr. Michael Prescott, a representative from the U.S. Environmental Protection Agency (EPA) Region 2, conducted a consolidated multi-media inspection of the US Army Garrison Fort Buchanan facility. The following are screening observations for CWA SPCC, CAA 112r, and SDWA UIC programs.

Spill Prevention Control Countermeasure (SPCC) - Fort Buchanan and ARCCOMS had several Aboveground Storage Tanks (ASTs) with a combined capacity for storage of oil (as defined in the SPCC regulations) that exceeded the 1,320-gallon applicability threshold, thus making the facility subject to the SPCC regulations.

Fort Buchanan has a SPCC Plan (which includes ARCCOMS) that was last updated in January 2016. Mr. Prescott performed a cursory review of this SPCC Plan and it appeared to meet the applicable regulatory requirements. In addition, facility representatives reported that SPCC training and annual spill prevention briefings had been conducted for employees at the facility. Mr. Prescott did not observe any concerns with the ASTs and drums that stored oil that were observed during the inspection.

112r Risk Management Program - Facility representative reported they did not have large quantities of the regulated hazardous chemicals at their facility and Mr. Prescott did not observe any. In addition, there was no report of having ammonia refrigeration units.

Underground Injection Control (UIC) - Facility representative reported they did not have UIC wells located at their facility and Mr. Prescott did not observe any.